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April 25, 1997

Facsimile 202 219-3923

Dawn M. Odrowski, Esquire
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

APR 23 10 23 AM '97

Re: **MUR 3774**
Coalitions for America, Inc.

Dear Ms. Odrowski:

Thank you for your letter of April 22, 1997.

Your request exemplifies the problem I had mentioned to you orally and to the Federal Election Commission ("FEC") in our Motion to Dismiss -- namely, MUR 3774 as to Respondent Coalitions for America, Inc. ("CFA") has become an harassing fishing expedition. As if past and pending requests were not sufficiently onerous, you now want to spread upon the FEC record, and eventually upon the public record, all CFA's 1992 activities, including those which occurred prior to CFA's receipt of donations from the National Republican Senatorial Committee and, hence, not even arguably connected with any such money.

FEC has no jurisdiction over CFA, or over any other entity qualified under 26 USC §501(c)(4), unless that entity involves itself, or permits itself to be involved, in a federal election.

Dawn M. Odrowski, Esquire

April 25, 1997

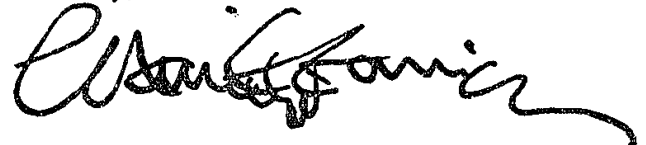
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CFA has not done so. For the obvious reason, there is no prima facie showing CFA has done so. Hence, there is no jurisdiction. CFA may accept a contribution from any lawful source other than a corporation qualified under 26 USC §501(c)(3). CFA may make a grant to any lawful entity other than a political candidacy or political committee. The two grantees about which you enquire are neither.¹

If the matter goes so far that the FEC administratively denies our Motion to Dismiss and seeks enforcement of the Subpoena in the United States District Court, we would seek to address the appropriate issues in that forum. If ultimately we prevail, there would be no need for further response, piecemeal or otherwise, to the series of haphazard FEC letters asking questions or to formal interrogatories. If FEC ultimately were to prevail, we, of course, would comply to the extent judicially mandated.

Hard copy follows.

Sincerely,



MARION EDWYN HARRISON

¹ The Leadership Institute and the Liberation Support Alliance, sub nominee National Federation of American Hungarians, are 26 USC §501(c)(3) entities. See IRS Publication 78 (Rev 11-96), Catatog [sic] #70390R, at 2:32 and 2:295.